

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED

10-16-07
12:04 PM

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the Low
Income Energy Efficiency Programs of
California's Energy Utilities

Rulemaking 07-01-042
(January 25, 2007)

Southern California Edison Company's
(U 338-E) Application for Approval of
SCE's "Change A Light, Change The
World," Compact Fluorescent Lamp
Program.

Application 07-05-010
(May 10, 2007)

**COMMENTS OF DISABILITY RIGHTS ADVOCATES ON ISSUES RAISED IN
THE KEMA REPORT**

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October 16, 2007

I. INTRODUCTION

On September 7, 2007, the Commission issued a report entitled “Final Report on Phase 2 Low Income Needs Assessment” (herein referred to as “KEMA Report”). The KEMA Report evaluates both the CARE and LIEE program based on whether and how these programs are meeting the needs of eligible low income utility customers.¹ The findings of the KEMA Report highlight, among other things, the importance of the LIEE program for persons with disabilities.

LIEE is particularly relevant for persons with disabilities given that this population is disproportionately low income. The KEMA Report found that one in four low income households have a member with a disability, and that for 20% of all low income households, the responsibility for making energy payments on behalf of the household lies with a disabled household member.² The KEMA Report further observed that many of California’s low income households are not currently employed.³ This is true for persons with disabilities who have the highest unemployment rate (68%) of any minority population in the United States.⁴ Accordingly, many persons with disabilities have a limited and fixed income and are frequently on government assistance. Those persons with disabilities who do work often can only work part-time, keeping them in a low income bracket.

LIEE measures are also of importance to persons with disabilities because this population is highly dependent on energy. Indeed the KEMA Report found that 56% of low income households with a disabled member spend more than 5% of their total

¹ Since this proceeding is focusing on the LIEE program, these Comments will not address the KEMA Report’s findings on the CARE program.

² “Final Report on Phase 2 Low Income Needs Assessment,” issued by the California Public Utilities Commission, September 7, 2007, p. 4-7 and 4-22.

³ *Id.* at 4-22 – 4-23.

⁴ According to the National Organization on Disability-Harris Poll in 2000, among adults with disabilities of working age (18 to 64), 32% work full or part-time, compared to 81% of those without disabilities.

household income on energy.⁵ This dependence on energy stems from the fact that many persons with disabilities spend more time at home than their non-disabled counterparts, and thus, require greater use of energy throughout the day than their non-disabled counterparts, who are not at home.⁶ Further, electricity powers much of the assistive technology which allows persons with disabilities to live independently in the community, including motorized wheelchairs, motorized scooters, electric door openers, automatic lifts and voice recognition software. Finally, because some persons with disabilities are extremely sensitive to temperature, health concerns mandate that they heat or cool their home to maintain an appropriate and constant temperature.⁷

This Rulemaking seeks to determine how the LIEE program might address the issues raise by the KEMA Report. Disability Rights Advocates (DisabRA) submits these comments to address the ways in which the LIEE program, in response to the KEMA Report, can ensure that the needs of persons with disabilities are met.

The September 27, 2007 Ruling asked the parties to submit comments on ten questions regarding the role of LIEE in responding to the KEMA Report. DisabRA does not respond to all questions posed but only to those which impact its constituency. Specifically, DisabRA recommends that the Commission (1) target households containing persons who have disabilities for the LIEE program; (2) ensure that communication about the LIEE program, including enrollment applications, are accessible; (3) investigate the possibility of auto-enrollment into the LIEE program if a household receives SSDI benefits; (4) adopt the Commission's staff program delivery

⁵ KEMA Report, p. 5-15. DisabRA recognizes that the Medical Baseline program is designed to address additional energy needs resulting from a person's disability. The Medical Baseline program is open to all with disabilities, not just low income customers. Even though Medical Baseline may reduce costs resulting from a greater energy burden, persons with disabilities who are low income, like all low income customers, continue to face substantial burdens in paying their energy bills.

⁶ National Organization on Disability-Harris Poll in 2000 found that people with disabilities are less likely to socialize and participate in leisure activities outside the home.

⁷ KEMA Report, p. 5-29 (noting that 42% of low income households which have a disabled household member report a health problem due to a condition of their home, such as house temperature).

strategy and (5) remain aware of the importance of health and comfort considerations in improving the LIEE program. Below DisabRA discusses each of these in turn.

II. THE LIEE PROGRAM SHOULD EXPAND EFFORTS TO TARGET PERSONS WITH DISABILITIES FOR PARTICIPATION.

Questions 1 and 2 ask about strategies for expanding participation in LIEE in areas where there do not appear to be any unique challenges and whether particular groups should be targeted for the LIEE program. The KEMA Report expressly recommends expanding efforts to target households with persons who have disabilities. Specifically, it states that “households with disabilities...demonstrate significant need for the programs’ services, and would be willing and relatively straightforward to recruit. However, participation from th[is] segment appears to be lagging behind need and, as such, more aggressive efforts to target th[is] important group should be ensured.”⁸ To this end, DisabRA urges the Commission to expand participation in the LIEE program by persons with disabilities through the use of disability-related CBOs and possibly auto-enrollment programs. DisabRA further urges the Commission to target persons with disabilities for participation in the LIEE program by using accessible outreach materials.

A. Question 1: Strategies for Expanding Participation for Persons with Disabilities

The KEMA Report found that the disability community is willing to participate in the LIEE program and relatively straightforward to recruit through more aggressive efforts.⁹ The KEMA Report notes that the households with persons who have disabilities are one of the “most promising” segments of the low income population for the LIEE program, meaning they exhibit need, willingness and accessibility.¹⁰ Accessibility, in this context, means that this group could be easily accessed through existing program

⁸ *Id.* at 7-28

⁹ *Id.*

¹⁰ *Id.* at 7-13

outreach and recruitment channels, including community-based strategies.¹¹ DisabRA agrees that current outreach and recruitment channels could be used. However, they must be used more aggressively to reach and recruit members of the disabled population. Specifically, DisabRA believes that community-based strategies for expanding participation in the LIEE program to persons with disabilities should include an aggressive outreach campaign to disability-related community-based organizations. In particular, disability-related community-based organizations that specialize in providing information on assistance programs and advocacy for persons with disabilities, such as independent living centers, have a high percentage of clients who are low income. These organizations function as a clearinghouse for information on enrollment in other public programs, such as SSDI, and could add energy savings programs to the information which they provide. While DisabRA has previously suggested utilizing these organizations, DisabRA recommends that the utilities become more proactive in their use of these organizations. For instance, instead of simply providing literature on the LIEE program, the utilities could make presentations at the organizations about LIEE and also energy efficiency measures in general.

Further, the Commission should act to increase participation by persons with disabilities in the LIEE program by exploring the possibility of an auto-enrollment program for persons on SSDI. While the KEMA Report found that such programs did not result in dramatic increases in program penetration it did note that this was a way to identify households with a need and a demonstrated willingness to accept the types of assistance and services provided by these programs.¹² Households with persons who have disabilities have both that need and that willingness. Accordingly, DisabRA

¹¹ *Id.* at 7-12

¹² *Id.* at 7-29.

advocates that the Commission investigate whether persons on SSDI who are the party responsible for paying the bill should automatically qualify for LIEE measures.¹³

B. Question 2: Strategies for Targeting Persons with Disabilities

As the KEMA Report recommends, the Commission should target households with persons who have disabilities.¹⁴ Targeting such households can be a part of a more aggressive outreach campaign as described above. However, targeting also includes recognition of the unique needs for some persons with disabilities. Specifically, in order to target the 23% of the low income households in which the member has a hearing, vision or physical disability it is necessary to understand how to do so through accessible communications.¹⁵ DisabRA has previously discussed the importance of accessibility in this regard, and both the utilities and the Commission have been responsive. However, in light of the KEMA Report's findings that households with persons who have disabilities remain underserved, DisabRA highlights again the key aspects of accessible communication which is essential for targeting the disability community.

The KEMA Report found that low income households most commonly call their utility (69% of respondents) in order to find out about energy conservation and ways to lower their energy bill.¹⁶ This reliance on the utility for information about the LIEE program demonstrates the importance of having and maintaining TTY numbers for persons with hearing disabilities. The Commission in the context of A.06-06-032 directed the utilities to ensure that TTY calls are answered in the same manner and with

¹³ DisabRA recognizes that SSDI qualification is not based on household income. However, if the person on SSDI is the party responsible for paying the bill, as is the case in 20% of all low income households, it is likely that the SSDI payment is the primary, if not sole, income for the household, putting the household in the income range to qualify for LIEE.

¹⁴ KEMA Report, p. 7-28

¹⁵ *Id.* at 4-22.

¹⁶ *Id.* at 5-76.

the same efficiency as other voice calls.¹⁷ Further, in that proceeding, the utilities were directed to present the TTY number with the same prominence as other contact numbers.¹⁸ DisabRA's recent test of the utilities' TTY numbers had mixed results. On October 15, 2007, DisabRA did not reach a live operator, an answering machine, for any of the utilities.¹⁹ On October 16, 2007, DisabRA was able to reach live operators for two of the three utilities.²⁰ As such, DisabRA asks the Commission to reiterate that TTY calls must be answered in the same manner and with the same efficiency as other voice calls.

The KEMA Report found that low income households also use their utility bill in order to find out about energy conservation and ways to lower their energy bill.²¹ Those persons with vision disabilities who rely on their utility bills for information on programs such as the LIEE program would be well-served if the utilities were to use large print for bill advertisements (whether inserts or on the bill itself) when presenting information regarding the LIEE program. DisabRA urges the Commission to direct the utilities to include large print formats when advertising low income programs, such as LIEE, within their utility bills. At a minimum, the utilities should be required to note in large print on the standard version of the bill that there is further information about the LIEE program available in large print upon request.

Aside from utility bills, DisabRA also urges the Commission to require that all written outreach materials for the LIEE program be made available in large print. Accordingly, whenever outreach materials are distributed (i.e. community event), utilities must have large print versions on hand. As a side note, per Question 6 which asks about educational measures (including with regard to the programmable thermostats), DisabRA

¹⁷ See D.06-12-038 (Dec. 14, 2006), p. 15.

¹⁸ *Id.*

¹⁹ SCE's line was repeatedly busy; SDG&E's line went unanswered; and, PG&E's line provide no answer.

²⁰ DisabRA was unable to reach anyone at PG&E using its TTY number.

²¹ KEMA Report, p. 5-76.

requests that whatever education measures are undertaken, the materials associated with that education program be in accessible format.

It should also be noted that seniors, who do not always identify as having disabilities, would greatly benefit from accessible communication, such as large print. Given that one in every two low income households contains a member who is either elderly and/or disabled, there is a clear need among the senior population for low income programs.²² Making these low income programs, such as LIEE, accessible to persons with disabilities will also make them more accessible to seniors.

III. THE LIEE PRGAM SHOULD BE MODIFIED TO MAKE THE APPLICATION PROCESS AS SIMPLE AS POSSIBLE.

Questions 4 and 5 ask about the LIEE application and documentation requirements. DisabRA urges the Commission to make the application process as simple as possible. In addition, while reducing the documentation requirements may also reduce the perceived stigma of the LIEE program, persons with disabilities are often already reliant on social welfare programs and not likely to be deterred by the perceived stigma as much as by inaccessible application processes.

A. Question 4: Making the LIEE Application Process Accessible

As DisabRA understands the current application process relies on identification of a potential LIEE participant and then an assessment of that participant's residence to determine whether LIEE measures would be appropriate. DisabRA's concern is with the identification stage. PG&E and SCE websites have a way in which an individual can apply for LIEE and in the alternate a telephone number to call. However, the website applications for the LIEE programs are not accessible. The text boxes which the applicant must fill in to complete the application are not "labeled" for screen readers. A person using a screen reader would thus not know what information is being requested. Further, there is no TTY telephone number listed which the potential participant could

²² *Id.* at 4-21.

call.²³ Of course, this is just one way of identification of a potential participant. Outreach, no doubt, also yields a pool of potential participants which demonstrates again why accessible outreach is so important. DisabRA requests that the Commission require online applications for the LIEE program be accessible and that a TTY number be included on the webpage for that application.

B. Question 5: Reducing Documentation for the LIEE Program

Because many persons with disabilities already rely on assistance programs, they are less likely to be concerned with the stigma of using an assistance program such as LIEE. However, reducing documentation would make enrollment less of a barrier for persons with disabilities. If the LIEE program would allow cross-qualification in conjunction with other low income assistance programs and not require further proof of income, this would greatly reduce the documentation needed. Already those who qualify for CARE automatically qualify for LIEE.²⁴ However, as mentioned above, the Commission should investigate whether qualification for SSDI should automatically satisfy the proof of income requirements for the LIEE program. If SSDI could satisfy these requirements documentation could be reduced.

IV. DISABILITY RIGHTS ADVOCATES SUPPORTS THE PROGRAM DELIVERY STRATEGY CREATED BY COMMISSION STAFF.

Question 8 asks about ensuring households receive the measures that are needed. The Commission staff created a plan based on household density and energy usage to address this issue. Based on this plan, households with high energy usage located in high density areas and sparsely populated areas would receive a comprehensive treatment of

²³ Sempra does not have an online form and on its brochure for the program (which is available in large print) does include a TTY number.

²⁴ DisabRA notes that the water utilities are currently initiating and/or formalizing their low income efficiency programs. The Commission may want to look into whether qualification for the water low income programs should automatically qualify a customer for LIEE and vice versa.

measures. DisabRA supports this plan because persons with disabilities, regardless of their location, generally are high energy users and thus, would be adequately treated through this plan. DisabRA, in particular, supports the door-to-door outreach approach for the high energy use households in high density areas. This would overcome many of the accessibility obstacles posed by written outreach materials and TTY communications.

DisabRA also continues to support the KEMA Report recommendation of mailing a CFL to populations likely to be eligible for LIEE as an outreach tool. In providing the CFLs, the utilities could create a method for identifying their target populations and learning more about them, while the target populations could find out more about the LIEE program. In particular, the receipt of something tangible could demonstrate the utilities' commitment to providing something "free" to the low income household and perhaps increase interest in the program.

V. THE HEALTH AND COMFORT FINDINGS IN THE KEMA REPORT PROVIDE INSIGHTS INTO IMPROVING THE LIEE PROGRAM.

Question 10 asks what other information or recommendations in the KEMA Report provide insights about whether and how the utilities could improve the LIEE program. DisabRA believes that the KEMA Report appropriately highlights the importance of the LIEE program providing for the health and comfort of low income households.²⁵ The importance of health and comfort cannot be underestimated for households with persons who have disabilities. The KEMA report found that 26% of low income households reported a health problem due to a condition of their home, such as poor air quality or house temperature. Forty-two percent of low income households with a disabled household member report such a health-related concern.²⁶ This is unsurprising given that some physical disabilities affect a person's respiratory function or ability to

²⁵ See KEMA Report, p. 5-27; 5-29

²⁶ *Id.* at 5 – 29

regulate body temperature. The utilities must not lose sight of this goal in improving the LIEE program.

VI. CONCLUSION

DisabRA appreciates the opportunity to describe the needs of its constituency with regards to the LIEE program. DisabRA believes that the KEMA Report provides valuable information that should help re-shape the current LIEE program. Specifically, DisabRA urges the Commission to target the disabled population in outreach efforts for LIEE and in so doing rely on accessible communications. DisabRA also asks the Commission to investigate whether receipt of SSDI benefits by the person responsible for the utility bill should automatically qualify the household for LIEE measures. DisabRA supports the Commission's suggested program delivery strategy as it would meet the needs of persons with disabilities; however, DisabRA highlights the importance of considering the health and comfort of low income households who are eligible for the LIEE program. DisabRA respectfully requests that the Commission adopt DisabRA's recommendations as a part of the Commission's consideration of how the LIEE programs can address the issues raised in the KEMA Report.

Signed: October 16, 2007

Respectfully Submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Comments of Disability Rights Advocates on Issues Raised in the KEMA Report” on all known parties on R.07-01-042. In addition I have served, by U.S. Mail, a paper copy to ALJ Malcolm.

Dated October 16, 2007, at Berkeley, California.

/s/
Lauren M. Roberts

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